

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
[Alexandria Division]**

**IN RE: OUTSIDEWALL TIRE
LITIGATION**

Case No. 1:09-cv-1217
Case No. 1:09-cv-1218

Case No. 1:09-cv-1218 (TSE/IDD)

**DEFENDANT SHANDONG LINGLONG RUBBER CO. LTD.'S
RESPONSES TO PLAINTIFFS' FIRST SET OF
REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

Subject to its objection to, and without consenting to, jurisdiction and subject to its defenses under Federal Rule of Civil Procedure 12(b)(2) Defendant Shandong Linglong Rubber Co. Ltd. ("Linglong Rubber") hereby responds to Plaintiffs' First Set of Requests for the Production of Documents to Linglong Rubber ("Document Requests") pursuant to Local Rule 26(C) and Fed. R. Civ. P. 34 as follows:

GENERAL AND SPECIFIC OBJECTIONS

Linglong Rubber refers to its Objections to Plaintiffs' First Set of Requests for the Production of Documents dated February 17, 2010 ("Objections") and incorporates the Objections by reference as if fully set forth herein.

RESPONSES TO DOCUMENT REQUESTS

REQUEST NO. 1:

All Documents relating to the ownership of one or more companies or corporate entities

in the Linglong Group or the relationship between two or more such companies.

RESPONSE TO REQUEST NO. 1:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. In response to Request No. 1 Linglong Rubber produces documents evidencing the incorporation, registration to do business and ownership of Linglong Rubber. *See* LR 000225 – LR 000769. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 2:

All Documents relating to managers, directors, or officers in every company or corporate entity in the Linglong Group, including Linglong North America, LLC and The Linglong Tire and Rubber Co. of North America.

RESPONSE TO REQUEST NO. 2:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. In response to this Request, Linglong Rubber produces documents relating to managers, directors, or officers of Linglong Rubber. *See* LR 000225 – LR 000769. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 3:

All Documents relating to the relationship between Linglong North America, LLC or The Linglong Tire and Rubber Company of North America, LLC, and any other company in the Linglong Group.

RESPONSE TO REQUEST NO. 3:

Linglong Rubber has construed this Request as demanding documents related only to Linglong Rubber's relationship with Linglong North America, LLC or The Linglong Tire and Rubber Company of North America, LLC, because Linglong Rubber is the only defendant in this action, and has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 4:

All Documents relating to payments to Sam Vance.

RESPONSE TO REQUEST NO. 4:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 5:

All Documents and Communications with or relating to Ashley Vance that also relate to any Mining Tire or line of Mining Tires.

RESPONSE TO REQUEST NO. 5:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber

does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 6:

All Documents relating to payments to Ashley Vance.

RESPONSE TO REQUEST NO. 6:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 7:

All Documents and Communications with or relating to Jordan Fishman.

RESPONSE TO REQUEST NO. 7:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 8:

All Documents and Communications with or relating to Alpha, including without limitation all Documents relating to the design, sale, price, functionality, quality, distribution, purchasers, manufacturing cost or any other aspect of any Mining Tires or line of Mining Tires

that Alpha designed, sold or distributed.

RESPONSE TO REQUEST NO. 8:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber is continuing its investigation and reserves the right to amend this response or supplement its document production.

REQUEST NO. 9:

All Documents and Communications relating to the sale of any Mining Tire by a Person or company in the Linglong Group or the Al Dobowi Group.

RESPONSE TO REQUEST NO. 9:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber is continuing its investigation and reserves the right to amend this response or supplement its document production.

REQUEST NO. 10

All Documents that identify customers who have purchased Mining Tires from the Linglong Group, the Al Dobowi Group or Alpha, including without limitation all customer lists prepared by a Person in the Linglong Group, a Person in the Al Dobowi Group, Sam Vance, Ashley Vance, or a present or former Alpha employee.

RESPONSE TO REQUEST NO. 10:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 11

All Documents and Communications with or relating to Simon Ridgeway.

RESPONSE TO REQUEST NO. 11:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 12

All Documents and Communications with or relating to Sandvik Mining and Construction.

OBJECTIONS TO REQUEST NO. 12:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 13

All Documents and Communications with or relating to S & S Firestone, Inc.

RESPONSE TO REQUEST NO. 13:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 14

All Documents and Communications between any Employee in the Al Dobowi Group and any Employee in the Linglong Group.

RESPONSE TO REQUEST NO. 14:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber is continuing its investigation and reserves the right to amend this response or supplement its document production.

REQUEST NO. 15

All Documents in the possession of a company within the Linglong Group relating to the development of any Mining Tire or line of Mining Tires (such as the Infinity line), including without limitation any time sheets or other Documents or databases reflecting that any person spent time or performed work, however minor, on the development of any Mining Tire.

RESPONSE TO REQUEST NO. 15:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 16

All drawings or blueprints relating to all Mining Tires.

RESPONSE TO REQUEST NO. 16:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. In response to this Request Linglong Rubber produces drawings obtained from the Copyright Office by Linglong Rubber's counsel, Holland & Knight LLP. Linglong Rubber does not otherwise have documents or information responsive to this Request. *See* LR 000770- LR 000865. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 17

All Documents relating to all drawings or blueprints for all Mining Tires, including without limitation all Documents relating to the acquisition of such drawings or blueprints.

RESPONSE TO REQUEST NO. 17:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. In response to this Request Linglong Rubber produces drawings obtained from the Copyright Office by Linglong

Rubber's counsel, Holland & Knight LLP. Linglong Rubber does not otherwise have documents or information responsive to this Request. See LR 000770- LR 000865. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 18

All Documents relating to any effort or action by any Person or company in the Linglong Group to protect the secrecy or confidentiality of any aspect (including drawings, sizes, molds, or markings) of any Mining Tire or Mining Tire design, including without limitation any Mining Tire in the Infinity line.

RESPONSE TO REQUEST NO. 18:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 19

All Documents and Communications relating to any sale or purchase of any Mining Tires or molds used in the production of Mining Tires.

RESPONSE TO REQUEST NO. 19:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 20

All Documents and Communications relating to the determination of the price for any Mining Tire or line of Mining Tires, including without limitation any price list, any document relating to research regarding the price or value of Mining Tires, and any price set by a Person or company in the Linglong Group, a Person or company in the Al Dobowi Group, Sam Vance, Ashley Vance, Alpha or Fishman.

RESPONSE TO REQUEST NO. 20:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 21

All Documents and Communications relating to the cost to manufacture or distribute Mining Tires, including without limitation all Documents concerning the cost of Mining Tire components or raw materials, the cost to acquire or make Mining Tire molds, the cost to acquire or make Mining Tire blueprints, the weight of any Mining Tire or grouping of Mining Tires, or the cost to ship any Mining Tire or grouping of Mining Tires.

RESPONSE TO REQUEST NO. 21:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 22

All Documents and Communications relating to any payment from a Person or company in the Al Dobowi Group to a Person or company in the Linglong Group.

RESPONSE TO REQUEST NO. 22:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber is continuing its investigation and reserves the right to amend this response or supplement its document production.

REQUEST NO. 23

All Documents and Communications relating to any payment from a Person or company in the Linglong Group to a Person or company in the Al Dobowi Group.

RESPONSE TO REQUEST NO. 23:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber is continuing its investigation and reserves the right to amend this response or supplement its document production.

REQUEST NO. 24

All Documents relating to the revenue or profits made by any person or company in the Al Dobowi Group from the design, manufacture, sale, distribution, importation, exportation or

transfer of any Mining Tires, any set of Mining Tires (including without limitation the Infinity line of Mining Tires) or any Mining Tire technology.

RESPONSE TO REQUEST NO. 24:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 25

All Documents relating to the revenue or profits made by each company in the Linglong Group.

RESPONSE TO REQUEST NO. 25:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. As stated in Linglong Rubber's objections to Request No. 25, Linglong Rubber will not produce any documents or information responsive to this Request without entry of a Stipulated Protective Order.

REQUEST NO. 26

All awards, plaques, framed weaponry, and any other commemorative item provided by Al Dobowi to Linglong, including the plaque pictured in Exhibits A-2 and A-3 to Plaintiffs Opposition to Al Dobowi's Motion to Dismiss, filed January 29, 2010 in the above-captioned matter.

RESPONSE TO REQUEST NO. 26:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 27

All Documents and Communications relating to formulation of the term "Mine Handler" including any drafts, preliminary versions, revisions, notes, or other tangible items relating to the creative process from which the term "Mine Handler" evolved.

RESPONSE TO REQUEST NO. 27:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 28

All Documents and Communications relating to the nature and extent of public use of the terms "Mine Handler" 1425x450-25, 1425x450-34, 57x2800-27, 57x2500-27, 48x2500-25.1, and 1320x355-23, *L-6T*, *L-6T+* and *EDT* and "A Recap" including documents relating to sales of products containing these marks.

RESPONSE TO REQUEST NO. 28:

Linglong Rubber has construed this Request as demanding documents related to and in

the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 29

All Documents relating to the Commonwealth of Virginia, including without limitation all Documents relating to a Person, event, or activity in the Commonwealth of Virginia and all Communications with any Virginia resident or any Person located in the Commonwealth of Virginia.

RESPONSE TO REQUEST NO. 29:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 30

All Documents relating to the disclosure of information regarding the design, price, manufacturing costs, or transportation costs of any Mining Tire, line of Mining Tires, or group, set or batch of Mining Tires to any Person.

RESPONSE TO REQUEST NO. 30:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber

reserves the right to amend this response or supplement its document production.

REQUEST NO. 31

All Documents relating to the volume of Mining Tires manufactured, produced, sold, imported, exported, distributed or transferred by any Person, company or corporate entity in the Al Dobowi Group or the Linglong Group.

RESPONSE TO REQUEST NO. 31:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 32

All Documents relating to all business plans developed, drafted, created or used in the design, manufacture, sale, distribution, importation, exportation or transfer of any Mining Tires, any set of Mining Tires (including the Infinity line of Mining Tires) or any Mining Tire technology.

RESPONSE TO REQUEST NO. 32:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber does not have any documents or information responsive to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 33

All Documents relating to any allegation in the Complaint.

RESPONSE TO REQUEST NO. 33:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber produces its tire catalogues in response to this Request. *See* LR 000001 – LR 000224. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 34

All Documents supporting any defense asserted or intended to be asserted by the Linglong Group.

RESPONSE TO REQUEST NO. 34:

Linglong Rubber has construed this Request as demanding documents related to and in the custody and control of Linglong Rubber, the only defendant in this action. Linglong Rubber produces LR 000001 – LR 000865 in response to this Request. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 35

All Documents intended to be used as exhibits at trial.

RESPONSE TO REQUEST NO. 35:

Linglong Rubber will identify and produce documents in response to this Request in accordance with its obligations under the Federal Rules of Civil Procedure, Local Rules, and Orders of this Court, including the scheduling orders. Linglong Rubber reserves the right to

amend this response or supplement its document production.

REQUEST NO. 36

All Documents and Communications provided to all experts consulted or retained by the Linglong Group.

RESPONSE TO REQUEST NO. 36:

Linglong Rubber will identify and produce documents in response to this Request to the extent such documents are not protected by the attorney-client privilege or work product doctrine and in accordance with its obligations under the Federal Rules of Civil Procedure, including without limitation Fed. R. Civ. P. 26(a)(2) and 26(b)(4)(B), the Local Rules, and Orders of this Court, including the scheduling orders. In accordance with the aforementioned rules Linglong Rubber is not producing any documents in response to this Request at this time. Linglong Rubber reserves the right to amend this response or supplement its document production.

REQUEST NO. 37

All Documents and Communications relating to reports provided to the Linglong Group by all experts consulted or retained by the Linglong Group, including all drafts and versions of such reports.

RESPONSE TO REQUEST NO. 37:

Linglong Rubber will identify and produce documents in response to this Request to the extent such documents are not protected by the attorney-client privilege or work product doctrine and in accordance with its obligations under the Federal Rules of Civil Procedure, including without limitation Fed. R. Civ. P. 26(a)(2) and 26(b)(4)(B), the Local Rules, and Orders of this

Court, including the scheduling orders. In accordance with the aforementioned rules Linglong Rubber is not producing any documents in response to this Request at this time. Linglong Rubber reserves the right to amend this response or supplement its document production.

DATED: March 4, 2010

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 2010, I sent a copy of the foregoing, Defendant Shandong Linglong Rubber Co. Ltd.'s Responses to Plaintiffs' First Set of Requests for the Production of Documents, via email and FedEx to the following:

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